

From: [Crossland, Ronnie](#)
To: [Mason, Steve](#); [Delgado, Eric](#); [Adams, Adam](#); [Loesel, Matthew](#); [Patel, Anish](#)
Cc: [Smith, Monica](#)
Subject: RE: Draft ITC update info you requested -- 03/28/2019
Date: Thursday, March 28, 2019 7:12:22 AM

From: Mason, Steve

Sent: Thursday, March 28, 2019 6:14 AM

To: Delgado, Eric <Delgado.Eric@epa.gov>; Adams, Adam <Adams.Adam@epa.gov>; Loesel, Matthew <loesel.matthew@epa.gov>; Patel, Anish <patel.anish@epa.gov>

Cc: Crossland, Ronnie <Crossland.Ronnie@epa.gov>; Smith, Monica <smith.monica@epa.gov>

Subject: Draft ITC update info you requested -- 03/28/2019

**Intercontinental Terminals Company (ITC) Fire Morning Update
Deer Park, Texas
March 28, 2019**

- EPA continues to participate in Unified Command with TCEQ, Harris County Pollution Control Services, and ITC.
- EPA and TCEQ discussed ITC's desire to decant liquids pulled from the bayou and ditch to help with storage capacity. Because the fluid will be considered a RCRA hazardous waste, decanting would be considered treatment, so it would not be allowed.
- ITC did ask whether the boom being used will have to be disposed of, or can it be cleaned for reuse? TCEQ will investigate an answer.
- Hydro cutting activities on tank 80-14 and 80-15 were put on hold due to parts not arriving yet and the decision it would be safer to do during daylight hours on March 28, 2019. Pumping of Tank 80-13 (toluene) continued overnight and is expected to be completed on March 28, 2019. Also on March 28, 2019, tanks 80-2 and 80-3 will be evaluated for product removal.
- Foaming of the secondary containment to prevent reignition and reduce emissions continues as necessary.
- Several entities including Texas Commission on Environmental Quality (TCEQ), EPA, the 6th Civil Support Team, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- Coast Guard has currently recovered 24,364 barrels of material from water operations. Approximately 35,724 barrels of material from the tank farm has been recovered. 128 cubic yards of solid waste has been generated. 12,600 feet of boom was deployed on March 27. 77,600 feet of 18" boom has been deployed and 2,640 feet of offshore 67" of boom has also been deployed. These numbers do not account for Tucker Bayou boom.
- The Strike Team, comprised of CST on behalf of TCEQ, EPA, and CTEH were sent to Houston Fuel Terminal Dock 3 at 11:42 pm to investigate a complaint about gaseous odors. The strike team observed visible material on the water and recorded a reading of .05 ppm of benzene.
- ITC continued air monitoring on March 27 (midnight to midnight); there were 3,220 VOC readings (603 detections) with and 2,204 benzene readings (424 detections).
- EPA continued mobile air monitoring on March 27 (12:00 pm) to March 28 (4:00 am) at 37 locations. There were 0 detections above the action level noted.
- ASPECT conducted flight 14 on March 27. Imagery collected on this flight indicates that the NW tanks in the tank farm are at essentially at ambient temperature. Analysis of FTIR data showed one cluster of isobutylene north of the site at maximum levels of 1.60 ppm. Infra-red and photographic data collected over the confluence area tends to show a reduction in the amount of trapped product. Leakage is still present but in less amounts as on prior flights.
- EPA's TAGA Mobile laboratory continued monitoring during the day of March 27.
- EPA collected 11 water samples on March 27; nine of the samples were collected from previously sampled locations in Buffalo Bayo, and southwest of Crystal Bay; two of the samples came from locations near Lynchburg Reservoir
- TCEQ continued handheld air monitoring between 2:00 pm and 10:00 pm on March 27 (39 readings). No significant readings were detected.
- Unified Command developed, reviewed, and approved the Incident Action Plan (#6) for the next operational period.
- Vacuum truck operations at Tucker Bayou and the outfall ditch continue on 24 hour basis.

Tank Status as 4:00 am on March 28, 2019

| Tank # | | Original Volume | Updated Volume | Flow rate | Transfer Method | Status | Notes |
|--------|---------------------|-----------------|----------------|-----------|-----------------|---------|-----------------|
| 80 - 1 | Base Oil | 48,713 bbls | 4,522 bbls | | | Standby | |
| 80 - 2 | Gasoline Blendstock | 38,451 bbls | 5,437 bbls | | | Standby | |
| 80 - 3 | Gasoline Blendstock | 33,200 bbls | 5,441 bbls | | | Standby | Being evaluated |

| | | | | | | | |
|---------|---------------------|-------------|-------------|------------|------------------|----------|------------------------|
| 80 - 4 | Base Oil | 34,808 bbls | 7,393 bbls | | | Standby | |
| 80 - 5 | Xylenes | 35,502 bbls | 6,529 bbls | | | Standby | |
| 80 - 6 | Gasoline Blendstock | 48,147 bbls | n/a | | | Standby | |
| 80 - 7 | Py Gas | 42,680 bbls | Empty | | Submersible pump | Complete | Pumping water and foam |
| 80 - 8 | Naptha | 69,482 bbls | 9,072 bbls | | | Standby | |
| 80 - 9 | EMPTY | Empty | Empty | | | Standby | |
| 80 - 10 | Py Gas | 14,294 bbls | 2,207 bbls | 553 bbl/hr | Inline System | Complete | Stripped |
| 80 - 11 | Base Oil | 51,741 bbls | 51,671 bbls | | | Standby | |
| 80 - 12 | EMPTY | Empty | Empty | | | Complete | |
| 80 - 13 | Toluene | 13,854 bbls | 4,237 bbls | 446 bbl/hr | | Active | |
| 80 - 14 | Py Gas | 13,837 bbls | 264 bbls | | Inline System | Complete | |
| 80 - 15 | Py Gas | 9,354 bbls | Empty | | | Complete | |

With Regards, Steve



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"Frequently, my thoughts get bored and walk down to my mouth. Often, this is a bad thing."